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25 October 2004

Mr. Ross del Rosario (SR-6J)
Remedial Project Manager
U.S. Environmental Protection Agency
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

U.S. EPA Contract No. 68-W7-0026
Work Assignment No. 233-RICO-B51W
Document Control No. RFW233-3A-ARPD

Re: Supplemental Site Investigation Work Plan
Downers Grove Sanitary District
Downers Grove, Illinois

Dear Mr. Rosario:

At the request of the United States Environmental Protection Agency (U.S. EPA), Weston Solutions, Inc. (WESTON®) has completed a technical review of the Supplemental Site Investigation Work Plan prepared by Huff & Huff, Inc. for Gardner Carton & Douglas, on behalf of the Downers Grove Sanitary District (DGSD). The document was received by WESTON on 20 October 2004. The following paragraphs summarize general and specific comments developed after review of the supplemental work plan.

Background: The DGSD conducted site characterization activities in October and November 2002 to investigate the area surrounding two former sludge lagoons in the Ellsworth Industrial Park. The U.S. EPA provided technical comments to the DGSD on the original Site Investigation Work Plan (Huff & Huff, September 2002) in a letter dated 10 October 2002. The DGSD responded to these comments on 17 October 2002, but elected to proceed with their proposed scope of work without incorporating U.S. EPA-suggested work scope modifications. This supplemental work plan was prepared by the DGSD to outline proposed additional investigation tasks to address data gaps regarding the sludge lagoons resulting from these previous characterization activities.

Sludge Characterization: Previous U.S. EPA comments regarding sludge sampling focused on the adequacy of the number of samples and locations necessary to fully characterize sludge materials within the two lagoons and determine whether these materials represent a potential source of volatile organic compounds (VOCs) present in groundwater at the site. U.S. EPA had requested sludge be sampled at multiple locations and depths in each lagoon; however, only one location was sampled in each lagoon. The Supplemental Site Investigation Work Plan indicates that sludge/soil samples will be collected from four locations per lagoon, and at approximate 1 to 1 ½ foot depth intervals up to 15 feet below ground surface (bgs). Given the results of the limited sludge samples collected





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in October/November, and additional information provided by the DGSD on how sludge was deposited in each lagoon, the proposed additional sludge sampling plan appears adequate to evaluate the characteristics of the sludge at sufficient lateral and vertical locations. This sludge sampling scope of work should result in sufficient information to evaluate whether the sludge lagoons represent a potential source of nearby groundwater VOC contamination.

There appears to be some inconsistency in the text regarding sludge sample methods compared to headspace screening procedures. It is stated that a Geoprobe system will be used to collect sludge/soil samples using a disposable plastic sleeve. These are typically 4-foot in length and are slit open to allow logging, screening, and sampling. An overall acceptable headspace screening procedure is discussed; however, this section indicates samples will be collected using split-spoon samplers (length not specified) and that a composited portion of each split-spoon will be collected for headspace screening. This may simply be a typographical error, but WESTON recommends that regardless of the equipment utilized, the headspace screening intervals match the sludge/soil sampling intervals specified in the supplemental work plan, noting that sample intervals vary between 1 and 1 ½ feet depending on depth.

Hydrogeology: The Supplemental Site Investigation Work Plan does not contain a scope of work to address potential data gaps concerning conflicting groundwater flow system interpretations at the DGSD site. The DGSD has installed additional monitoring wells at the site and previously prepared an interpretation of the groundwater chemistry and flow regime based on their data. An additional monitoring well to the northwest of the lagoons was previously recommended by U.S. EPA to more fully evaluate flow conditions and provide a monitoring point between the lagoons and the main portion of the DGSD works. WESTON understands that U.S. EPA is currently gathering additional groundwater data in the vicinity of the DGSD site. Based on this, no comments regarding further hydrogeologic characterization activities are included at this time.

Should you have any questions or require additional information, please feel free to contact me at (847) 918-4016.

Very truly yours,
Weston Solutions Inc.

A handwritten signature in black ink, appearing to read "Kurt T. Fischer", with a long horizontal line extending to the right.

Kurt T. Fischer, P.G.
Senior Project Manager